

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

NO. 5:18-CR-00452-FL-1

UNITED STATES OF AMERICA )  
v. ) **MOTION FOR DISCLOSURE OF RULE**  
LEONID ISAAKOVICH TEYF ) **404(b) EVIDENCE AND INCORPORATED**  
 ) **MEMORANDUM OF LAW**  
 )

NOW COMES Defendant Leonid Isaakovich Teyf, through undersigned counsel, and pursuant to Rule 12(b) of the Federal Rules of Criminal Procedure, hereby requests of the Government that it disclose the substance of any evidence it intends to introduce against Defendant pursuant to Rule 404(b) of the Federal Rules of Evidence, so that Defendant may, if appropriate, move to suppress or exclude such evidence.

Rule 404(b) of the Federal Rules of Evidence provides:

[U]pon request by the accused, the prosecution in a criminal case shall provide reasonable notice in advance of trial, or during trial if the court excuses pretrial notice on good cause shown, of the general nature of any such evidence it intends to introduce at trial.

Defendant files this request to preserve the record as to his objections to the introduction of any Rule 404(b) evidence, and to determine if the Government contends that it possesses evidence that may be admissible under Rule 404(b), so that Defendant may move, prior to trial, to exclude such evidence.

This the 13<sup>th</sup> day of January, 2020.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 13<sup>th</sup> day of January, 2020, I electronically filed the foregoing **MOTION FOR DISCLOSURE OF RULE 404(b) EVIDENCE AND INCORPORATED MEMORANDUM OF LAW** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

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